

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:20-cr-47-1B0(4)

FILED IN OPEN COURT

ON 1/24/20 STS

Peter A. Moore, Jr., Clerk  
US District Court  
Eastern District of NC

UNITED STATES OF AMERICA

v.

SAUL REYES-MENDOZA

a/k/a "Eulalio Reyes-Mendoza"

INDICTMENT

The Grand Jury charges:

COUNT ONE

From on or about February 9, 1995, and continuing thereafter until on or about August 3, 2016, in the Eastern District of North Carolina, and elsewhere, the defendant, SAUL REYES-MENDOZA, also known as "Eulalio Reyes-Mendoza," in a matter within the jurisdiction of the United States Social Security Administration, for the purpose of obtaining something of value and for other purposes, did knowingly and with intent to deceive, falsely represent Social Security account number XXX-XX-9485, in an application for asbestos accreditation with the North Carolina Department of Health and Human Services, to have been assigned by the Commissioner of Social Security to him, when in fact, as the defendant then knew, such number was not the Social Security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

### **COUNT TWO**

On or about December 17, 2019, in the Eastern District of North Carolina, the defendant SAUL REYES-MENDOZA, also known as "Eulalio Reyes-Mendoza," did knowingly possess a document prescribed by statute and regulation as evidence of authorized stay and employment in the United States, that is, Social Security card XXX-XX-3357, knowing such document was falsely made and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

### **COUNT THREE**

On or about December 17, 2019, in the Eastern District of North Carolina, the defendant SAUL REYES-MENDOZA, also known as "Eulalio Reyes-Mendoza," did knowingly possess a document prescribed by statute and regulation as evidence of authorized stay and employment in the United States, that is, Social Security card XXX-XX-9485, knowing such document was falsely made and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

### **COUNT FOUR**

On or about December 17, 2019, in the Eastern District of North Carolina, the defendant SAUL REYES-MENDOZA, also known as "Eulalio Reyes-Mendoza," did knowingly possess a document prescribed by statute and regulation as evidence of authorized stay and employment in the United States, that is, Social Security card XXX-XX-6954, knowing such document was falsely made and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT FIVE

From on or about January 9, 1995, and continuing thereafter until on or about January 8, 2020, in the Eastern District of North Carolina, and elsewhere, the defendant, SAUL REYES-MENDOZA, also known as "Eulalio Reyes-Mendoza," in a matter within the jurisdiction of the United States Social Security Administration, for the purpose of obtaining something of value and for other purposes, did knowingly and with intent to deceive, falsely represent Social Security account number XXX-XX-9485, in connection with his employment at Demolition and Asbestos Removal, Inc., to have been assigned by the Commissioner of Social Security to him, when in fact, as the defendant then knew, such number was not the Social Security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON                     

01/22/2020  
DATE

ROBERT J. HIGDON, JR.  
United States Attorney

Sebastian Kielmanovich  
BY: SEBASTIAN KIELMANOVICH  
Assistant United States Attorney